

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,)	
)	
Petitioner/Judgment Creditor,)	
)	
v.)	Case No. 14-FJ-05-HE
)	
NOVA GROUP, INC.,)	
)	
Respondent/Judgment Debtor,)	
)	
AVON CAPITAL, LLC,)	
)	
Respondent/Judgment Debtor,)	
)	
ASSET SERVICING GROUP, LLC,)	
)	
Respondent/Garnishee,)	
)	
SDM HOLDINGS, LLC,)	
)	
Respondent/Garnishee,)	
)	
and)	
)	
AVON CAPITAL, LLC, a Wyoming Limited)	
Liability Company,)	
)	
Intervenor.)	

NON-CONTINUING GARNISHEE’S ANSWER

Comes now the Receiver of Avon Capital, LLC, a Wyoming Limited Liability Company (Avon Capital-WY), and submits, on behalf of the Manager of SDM Holdings, LLC (“SDM”), this Answer to the Non-Continuing Garnishment Summons filed by Universitas Education, LLC (“Universitas”) on May 30, 2024 [Doc. No. 654], as follows:

1. Universitas filed a Non-Continuing Garnishment Summons on May 30, 2024, with a required answer date of ten (10) days after the date of service. SDM is listed in the caption of this lawsuit and was served through the ECF System on May 30, 2024.

2. At the time of service of the Non-Continuing Garnishment Summons, an Order had been entered by this Court clarifying the authority of the Receiver and, in so doing, also delineating the relationship between Avon Capital-WY and SDM, *i.e.*, SDM is the wholly-owned subsidiary of Avon Capital-WY [Doc. No. 594].

DATED: June 10, 2024.

Respectfully submitted,

S/ Ryan Leonard

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Receiver

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

S/ Ryan Leonard

Ryan Leonard